

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 E-mail: jfoley@hkm.com

MARTA D. KURSHUMOVA, ESQ.

Nevada Bar No. 14728

3 E-mail: mkurshumova@hkm.com

HKM EMPLOYMENT ATTORNEYS LLP

4 1785 East Sahara, Suite 300

Las Vegas, Nevada 89104

5 Tel: (702) 625-3893

Fax: (702) 625-3893

6 *Attorneys for Plaintiff*

7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 KEITH PAUL, an Individual,

9 Plaintiff,

10 vs.

11 CITY OF HENDERSON, DOES I -X; ROE
12 CORPORATIONS I -X,

13 Defendant.

CASE NO.: 2:19-cv-00996-GMN-DJA

STIPULATION AND ORDER FOR
DISMISSAL

14 Plaintiff Keith Paul ("Plaintiff"), by and through his attorneys, JENNY L. FOLEY,
15 Ph.D., ESQ., and MARTA D. KURSHUMOVA, ESQ. of the law firm HKM EMPLOYMENT
16 ATTORNEYS LLP, and Defendant City of Henderson, by and through its attorney, BRIAN R.
17 REEVE, ESQ. and KRISTINA E. GILMORE, ESQ. of the CITY OF HENDERSON CITY
18 ATTORNEY'S OFFICE, hereby stipulate and agree that, consistent with the requirements of
19 F.R.C.P. 41(a)(1)(A)(ii), this matter shall be Dismissed with Prejudice as to the First
20 (Discrimination, Retaliation and Wrongful Termination in Violation of the National Labor
21 Relations Act of 1935), Second (Retaliatory Discharge in Violation of Public Policy and NRS
22 614.090) and Third (Retaliatory Discharge in Violation of NRS 288.270) Causes of Action.
23 The Parties stipulate and agree that the Fourth Cause of Action (Defamation) shall be Dismissed
24 without Prejudice. The Parties stipulate and agree that each party shall bear its own attorney's

1 fees and costs. In light of the parties' stipulation to dismiss this case, the parties respectfully
2 request that the Early Neutral Evaluation scheduled for October 3, 2019, be vacated.

3
4 Dated: September 24, 2019

CITY OF HENDERSON

6 By: /s/ Brian R. Reeve
BRIAN R. REEVE (#10197)
Assistant City Attorney
KRISTINA E. GILMORE (#11564)
Assistant City Attorney
240 Water Street, MSC 144
Henderson, Nevada 89015
Telephone: (702) 267-1231
Facsimile: (702) 267-1201
Email: brian.reeve@cityofhenderson.com
Attorneys for Defendant

11
12 Dated: September 24, 2019

HKM EMPLOYMENT ATTORNEYS LLP

13 By: /s/ Jenny Foley
Jenny L. Foley (#9017)
Marta D. Kurshumova (#14728)
1785 East Sahara, Suite 300
Las Vegas, Nevada 89104
Telephone: (702) 625-3893
Facsimile: (702) 625-3895
Email: jfoley@hkm.com
Email: mkurshumova@hkm.com
Attorneys for Plaintiff

18 **ORDER**

19 **IT IS SO ORDERED:**

20
21 Dated: _____, 2019

22
23 _____
United States District Court Judge